

# TAX CONFERENCE

MADRID CÍRCULO DE BELLAS ARTES

## International Update on BEPS. A Taxpayer's Perspective

MONTERO ARAMBURU ABOGADOS has organized a truly international conference on a very hot International Tax topic nowadays. Several actions of the OECD's Plan on BEPS will be addressed from a taxpayer's standpoint by prominent scholars and in-house tax experts. The practical consequences of such BEPS Action Plan in various LATAM and European countries will be covered by tax specialists of highly renowned law firms.

This conference will focus on the OECD Base Erosion and Profit Shifting (BEPS) Action Plan, which is already changing the international tax landscape. The topic will be addressed mainly from the taxpayer's perspective. Parts I and II will cover an update on several BEPS Actions with a special focus on the potential harmful consequences for the principle of legal certainty. Part III will consist on a round table regarding the current moral and political debate about international tax planning. Part IV will address from a very practical viewpoint the last tax developments in LATAM, Spain and Portugal, particularly where stemming from the BEPS Action Plan.

Prominent scholars such as Kees van Raad, Carlos Palao, Alfredo García Prats and Domingo Jiménez-Valladolid will enlighten us with their invaluable academic insight on the topic. In-house tax experts from non-Spanish MNEs will provide the audience with

a taxpayers' viewpoint –quite often overlooked in other debates about BEPS.

Finally, tax specialists of outstanding law firms from Mexico (Chevez Ruiz Zamarripa), Brazil (Stocche Forbes), Colombia (Lewin & Wills), Portugal (Vieira de Almeida) and Spain will identify and describe recent and expected international tax developments in their respective jurisdictions, particularly where related to BEPS.

The conference is targeted at in-house tax & legal professionals, CFOs, tax advisors, scholars and others who may be interested in the subject.

The conference will be held in English.

Looking forward to sharing with you such an interesting event.

> LIMITED SEATS AVAILABLE

### VENUE

Círculo de Bellas Artes  
C/ Alcalá, 42, Madrid  
Valle-Inclán Hall, 5th Floor

### DATE & TIME

Monday, 4th May 2015  
Time: 08.45 – 14.40

Price: EUR 120,00

### R.S.V.P.

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# Agenda

08.45 h – 09.00 h **Reception**

09.00 h – 09.10 h **Introduction**

**Ignacio Gordillo**  
Director International Tax  
Montero Aramburu Abogados

## Part I: Update on various BEPS Actions

09.10 h – 09.30 h **BEPS Action 2**

**Alfredo García Prats**  
Professor, Universidad de Valencia  
Of Counsel, Montero Aramburu Abogados

09.30 h – 09.50 h **BEPS Action 3**

**Domingo Jiménez-Valladolid**  
Professor, Universidad Autónoma Madrid

09.50 h – 10.10 h **BEPS Action 13**

**Erki Uustalu**  
Tax Counsel, Eesti Energia AS

10.10 h – 10.25 h **Coffee Break**

10.25 h – 10.55 h **BEPS Action 7**

**Kees van Raad**  
Professor, Leiden University  
Director, ITC Leiden  
Of Counsel, Loyens & Loeff

**Alfredo García Prats**  
Professor, Universidad de Valencia  
Of Counsel, Montero Aramburu Abogados

## Part II: Anti-abuse rules, legal (un)certainly and dispute resolutions

10.55 h – 11.15 h **Beneficial Ownership: recent developments**

**Kees van Raad**  
Professor, Leiden University  
Director, ITC Leiden  
Of Counsel, Loyens & Loeff

11.15 h – 11.35 h **BEPS Action 6: GAAR**

**Carlos Palao Taboada**  
Professor  
Of Counsel, Montero Aramburu Abogados

11.35 h – 11.55 h **BEPS Action 14**

**Balthasar Denger**  
Head of Tax, Panalpina

11.55 h – 12.15 h **Light lunch**

## Part III: International Tax Planning: morals, politics and media

12.15 h – 12.45 h **Discussion Panel: International tax planning and the media / politicians approach**

**Erki Uustalu**  
Tax Counsel, Eesti Energia AS

**Balthasar Denger**  
Head of Tax, Panalpina

**Kees van Raad**  
Professor, Leiden University  
Director, ITC Leiden  
Of Counsel, Loyens & Loeff

## Part IV: Practical consequences of BEPS in LATAM, Portugal & Spain

12.45 h – 13.05 h **Mexico**  
**Daniel de la Parra Huerta**  
Partner, Chevez Ruiz Zamarripa

13.05 h – 13.25 h **Brazil**  
**Renato Coelho**  
Partner, Stocche Forbes

13.25 h – 13.45 h **Colombia**  
**Andrés González**  
Partner, Lewin & Wills

13.45 h – 14.05 h **Portugal**  
**Joaquim Pedro Lampreia**  
Associate, Vieira de Almeida

14.05 h – 14.20 h **Spain**  
**Jorge Sánchez**  
Director International Tax  
Montero Aramburu Abogados

14.20 h – 14.40 h **Q&A**

14.40 h **Closing**  
**Ignacio Gordillo**  
Director International Tax  
Montero Aramburu Abogados

